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Comments of SDGE on 2017 Draft Integrated Energy Policy Report

Additional submitted attachment is included below.

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Subject: Comments on 2017 Draft Integrated Energy Policy Report, Docket Number: 17-IEPR-01

Dear Chairman Weisenmiller and fellow Commissioners:

San Diego Gas & Electric Company ("SDG&E") appreciates the opportunity to submit comments in response to the California Energy Commission's ("CEC") 2017 Draft Integrated Energy Policy Report ("2017 Draft IEPR") issued on October 16, 2017.

I. INTRODUCTION

SDG&E has demonstrated a long-standing commitment to implementing California's vision of a sustainable energy future, and takes pride in its ongoing partnership with the State and its residents in working towards cleaner, safer, and healthier communities by achieving California's energy and climate goals. SDG&E's commitment is to deliver cleaner energy to our customers, as safely as possible and with the highest level of reliability (and affordability). To do this, SDG&E is pursuing policies and projects that have put it at the forefront of delivering renewable energy – more than any other California energy utility; in creating the infrastructure and access required for wider adoption of electric and other clean vehicles; in deploying world-class battery storage technology that will further facilitate the integration of renewable resources; and in ensuring the reliability of our system with continued natural gas use and increased renewable gas use as the State transitions to an ever-more decarbonized system through the latter half of this century.

Indeed, SDG&E has been recognized on a national level for its efforts in the clean energy space. In recent years, for example, the Environmental Protection Agency ("EPA") has honored SDG&E with its Climate Leadership Award, acknowledging SDG&E's "exemplary corporate, organizational, and individual leadership in response to climate change." SDG&E's

environmental stewardship is a corporate value and an important part of the company's culture. SDG&E takes a holistic and comprehensive view on sustainability and seeks to incorporate sustainable best practices in all business processes.

SDG&E has also demonstrated steadfast commitment to California's greenhouse gas ("GHG") reduction goals. Even prior to adoption of Assembly Bill ("AB") 32, California's landmark GHG reduction measure, SDG&E demonstrated its leadership in GHG mitigation by publicly and voluntarily reporting its GHG emissions from the generation and distribution of natural gas and electricity under the California Climate Action Registry's rigorous registry program, earning the status of "Climate Action Leader." SDG&E remains committed to the State's vision of a low-carbon, sustainable energy future. It has been a leader in energy efficiency efforts and in promoting development of renewable energy resources. It achieved the State's 33% renewable portfolio standard ("RPS") in 2015 – the first of any utility to do so and a full five years ahead of the required schedule – and expects to deliver nearly half of its power from renewable resources by 2021 as a demonstration of its ongoing commitment to a clean energy future.

In addition, SDG&E continues to explore new avenues for achieving the State's GHG reduction goals across all sectors of the economy and to propose new initiatives aligned with this goal. For example, SDG&E's proposed Senate Bill ("SB") 350 transportation electrification programs will assist in reducing GHG emissions in the transportation sector, which accounts for more GHG emissions than any other sector.

SDG&E is supportive of comments made by our sister company, SoCalGas, which highlight the need to maintain and modernize the natural gas system in a manner that significantly enhances the overall safety, reliability, resiliency, and flexibility of the Southern California energy grid. The Final 2017 IEPR should recognize that investments in natural gas infrastructure are consistent with the state's safety, reliability, *and* climate goals. SDG&E and SoCalGas' co-sponsored Pipeline Safety & Reliability Project ("PSRP"), for example, would enhance public safety, improve reliability in a gas-constrained region, facilitate renewable gas usage in the greater San Diego area, and modernize the natural gas system through state-of-the-art technology upgrades.

Further, the Final 2017 IEPR should emphasize that safe and reliable pipeline infrastructure is a critical prerequisite to realizing the widely-recognized climate, air quality, and human health benefits that can be achieved by increased deployment of renewable gas to a variety of end uses. For example, in the absence of the PSRP, the San Diego region's ability to share in the myriad benefits of renewable gas would be uniquely jeopardized due to the region's constrained natural gas system.

A link is provided below to SDG&E and SoCalGas' prior joint comments on the Draft 2016 IEPR Update[1], which highlighted the need for the PSRP to meet a "top priority"[2] of the State for improving pipeline safety and reliability and safety risks from the California Public Utilities Commission's ("CPUC") denial of the North-South Project despite acknowledging the need for "enhanced system reliability in the Southern System."[3] The Final 2017 IEPR should recognize that these risks have only grown more urgent in the past year. Our joint statement from last year's comments remains equally germane today: "SoCalGas and SDG&E believe that investments in natural gas infrastructure that can accomplish multiple objectives simultaneously – e.g., safety, reliability and energy grid flexibility – should be encouraged and prioritized in order to meet California's dynamic and evolving energy needs and climate policies consistent with the Draft 2016 IEPR Update."

SDG&E is pleased to highlight in these comments the ways in which SDG&E policies align with those of the State, which the 2017 Draft IEPR report should, and in some cases does, reflect. SDG&E also offers what it hopes will be useful comments in bringing the report more directly in line with what it views as the most pressing, outstanding policy issues that the State needs to address to successfully achieve its stated clean energy and climate goals. These comments recommend or note that:

a. The 2017 Draft IEPR take a more critical look at the CEC and CPUC Integrated Resource Plan ("IRP") processes to ensure they are aligned to achieve the most cost-effective, economy-wide GHG emissions reductions, and that overall the same level of regulatory oversight and supervision of IRP requirements is applied to all load serving entities ("LSEs");

b. SDG&E's transportation electrification efforts align with many of the 2017 Draft IEPR recommendations;

c. The CEC should be careful to attribute savings to the appropriate sectors when determining energy efficiency doubling targets;

d. Self-generation customers be should excluded from additional achievable energy efficiency ("AAEE") potential; and

e. The 2017 Draft IEPR should expressly recognize that strategic investments in infrastructure, such as the PSRP, can improve safety while facilitating renewable gas deployment, modernizing the natural gas system, supporting the integration of renewables, and maintaining reliability of the electric grid.

[1] http://docketpublic.energy.ca.gov/PublicDocuments/16-IEPR-01/TN214407_20161107T155727_Tim_Carmichael_Comments_CEC_Draft_2016_IEPR_Update_SoCalGasSDGE.pdf

[2] 2015 IEPR at 146. "It is the policy of the state that the [CPUC] and each gas corporation place safety of the public and gas corporation employees as the top priority."

[3] CPUC Decision 16-07-015 at 24-25.

II. THE IEPR MUST TAKE A MORE CRITICAL LOOK AT THE CEC AND CPUC IRP PROCESSES AND ENSURE THEY ARE COORDINATED, WITH THE SAME LEVEL OF OVERSIGHT APPLIED TO ALL LSEs

SDG&E commends the work that the CEC and CPUC have committed to the development of their processes for implementing the IRP process as specified in SB 350. The shift from conceptual to practical application is always challenging, and that is especially true here given the transformative nature of the IRP initiative. Although the 2017 Draft IEPR highlights progress made to date, significant work remains to be done.

As discussed in more detail below, several aspects of the current IRP process require modification to ensure adherence to the State's policy goal of achieving GHG reduction at lowest cost across the entire economy, while enabling customers to be served with just and reasonable rates. The 2017 Draft IEPR's definition of an IRP is not expansive enough as defined on page 38. The goal of an IRP is more than just a plan to "meet specific policy goals." The goal of an IRP is to reliably meet customer energy needs at just and reasonable rates while incorporating policy goals. Also, a well-defined IRP process can and should provide policy makers with information as to the cost of their policy choices so they can consider these along with the goals of the policies. To maximize the success of this process in achieving the State's goals, IRP regulatory requirements must be managed and enforced with the same rigor and oversight across all LSEs.

A major concern with the IRP process being developed by state agencies is that it is heading down a path that undermines the State's goals for achieving all-sector GHG mitigation in the least cost manner by not fully integrating the IRP with the Cap-and-Trade ("C&T") program. An IRP process that picks a specific tonnage goal in a single year and then allocates it between investor-owned utilities ("IOUs") and publicly-owned utilities ("POUs"), as the State agencies have done, fails to account for reductions achieved through early actions which would penalize early actors like SDG&E by focusing only on a single year's GHG emissions rather than on GHG production over the entire planning horizon. Having state agencies split a GHG amount between IOUs and POUs does not result in the LSEs under each agency having equal obligations. There is no analysis of the reduction potential from each group, nor does each necessarily achieve the lowest cost GHG reductions.

Additionally, while SDG&E supports the concept of all LSEs meeting policy mandates, any adopted process needs to result in LSEs carrying out activities that are cost-effective when integrated into the State's C&T program and compared against the allowance price. Only if the agencies fully integrate the IRP and C&T processes can the State's policy goal of obtaining GHG reductions across all sectors at the lowest possible cost be realized.

The CEC and CPUC should consider that almost all LSEs under their jurisdictions are part of the California Independent System Operator ("CAISO") grid. The IRP processes must jointly quantify the need for new resources and then specify required resource characteristics. Since these diverse groups operate within the same balancing authority, an individual LSE's resource choice can impact all other parties. As an example, the amount of solar added by POUs

can impact the amount of curtailment experienced by the IOUs. There has been no coordination to address these impacts. The 2017 Draft IEPR should call this out.

Lastly, SB 350 does not contemplate that (1) the electric sector will assume a greater share of the cost burden of achieving the State's GHG reduction goals; or (2) one group of LSEs should shoulder more of the responsibility for GHG reductions than other LSEs. Nevertheless, this is precisely the outcome that could result from splitting a GHG volume target approach. Under the proposal being discussed at the CPUC, some LSEs would be obligated to pursue GHG reductions, notwithstanding the fact that the cost of such reductions will likely far exceed the C&T price. This will result in higher electricity prices for a subset of consumers and will directly undermine policy goals related to the electrification of other sectors. Equally problematic, CPUC-jurisdictional IOUs could be required to make greater GHG reduction than the POUs, whose IRPs are being overseen by the CEC. SDG&E is unaware of any effort by the CEC to require POUs to achieve a single-year tonnage reduction or to apply a planning approach that is being discussed at the CPUC. Thus, the obligations are unequal and bundled ratepayers will be forced to bear a disproportionate cost burden.

Thus, the 2017 Draft IEPR should take a more critical look at and address the differences between the CEC and CPUC IRP processes, and advocate broadly for equal levels of oversight and management of the process across all LSEs. Having the 2017 Draft IERP simply repeat what each agency is doing does not provide the critical evaluation needed of how the two divergent processes could result in unequal costs burdens being placed on consumers because of the different regulatory constructs.

III. SDG&E'S TRANSPORTATION ELECTRIFICATION IS ALIGNED WITH MANY OF THE 2017 DRAFT IEPR RECOMMENDATIONS

We appreciate the 2017 Draft IEPR's transportation electrification focus and recommendations; many of which line up with SDG&E's Clean Transportation leadership in programs and activities accelerating transportation electrification ("TE"). SDG&E's Power Your Drive ("PYD") program is providing grid-integrated electric vehicle ("EV") charging facilities at workplace and multi-unit dwellings. SDG&E's proposed SB 350 priority review projects address several electric vehicle charging areas including: Airport Ground Support Equipment, Electrify Local Highways with grid-integrated Level 2 ("L2") and Direct Current Fast Chargers ("DCFC") at Park-and-Ride locations, Medium Duty/Heavy Duty and Forklift Port Electrification, Fleet Delivery Services with L2 and DCFC grid-integrated charging, Green Taxi/Shuttle/Rideshare with grid-integrated DCFC charging, and Dealership Incentives. SDG&E has also proposed a SB 350 standard review project for 90,000 grid-integrated L2 home installations, including a target of 25% of installations in disadvantaged communities.

Below, SDG&E highlights many of its ongoing and planned initiatives which align with the 2017 Draft IEPR's recommendations. Below are several of the 2017 Draft IEPR recommendations related to transportation electrification that are examples of SDG&E's leadership and alignment in these areas.

a. SDG&E SB 350-related Transportation Electrification Aligns with the IEPR Recommendations:

1. *Formalize load research and infrastructure cost tracking capabilities.*

   SDG&E's PYD and SB 350 projects include load research and infrastructure data collection and tracking which will "track market growth of advanced vehicle technologies, and associate charging behaviors for load planning." (2017 Draft IEPR, p. 81)

2. *Coordinate electric transportation emissions allowance policies with CARB and align with established emissions assessment methods.*

   SDG&E has developed capabilities for "quantification methods and measurements" used in "CARB-jurisdictional programs" in its current participation in the C&T Program and Low Carbon Fuel Standard. (2017 Draft IEPR, p. 81)

3. *Enhance accessibility for charging infrastructure programs and tracking.*

   SDG&E's PYD and SB 350 projects include a Program Advisory Group designed to, among other things, facilitate stakeholder collaboration which "can help enhance existing program practices and may serve to enable more strategic and better coordinated charging infrastructure deployments." (2017 Draft IEPR, p. 81)

4. *Partner with local utilities and governments.*

   SDG&E's Clean Transportation is actively involved in "nonregulatory engagements outside of the formal integrated resource planning process with publicly-owned utilities to identify areas to support utility, governmental, and community initiatives that advance transportation electrification." This engagement includes participating in the local Clean Energy Taskforce, working with cities and municipalities to identify and develop transportation electrification ("TE") opportunities. SDG&E's engagement also includes outreach and program design and implementation processes that engage interested stakeholders like community, social justice, and environmental justice groups. (2017 Draft IEPR, p. 81)

5. *Learn and share from interstate and international charging technology best practices.*

   SDG&E continues to maintain active participation in a broad spectrum of organizations intended to share and learn about TE successes. SDG&E's engagements includes participation and/or presentations at CALSTART, EV-Grid, Electric Power Research Institute ("EPRI"), and Advanced Clean Transportation ("ACT") Expo, to name a few.

6. *Support the development of specialized consumer education and engagement tools.*

   SDG&E's Clean Transportation mandate, outreach and program implementations have created considerable opportunities to "enhance public understanding of the adequacy of electric vehicles for their transportation needs, the costs and benefits of using utility electricity rates, and the availability of public charging infrastructure services." (2017 Draft IEPR, p. 82)

b. SDG&E's Efforts to Increase Resiliency Align with IEPR Recommendations:

1. *Expand and improve rate setting to send price signals aimed at adjusting energy usage to help better manage the grid and integrate renewable resources.*

   SDG&E's PYD program and proposed SB 350 projects include Grid-Integrated day-ahead dynamic rates with clear price signals "to encourage smart charging that can help increase the resiliency of the grid" and to "provide the rapid responses needed to help manage large and fast ramps in generation" in the near term not "several years out." (2017 Draft IEPR, p. 119-120)

2. *Standardize electric vehicle charging equipment to enable resource dispatch.*

   SDG&E's PYD and proposed SB 350 projects could provide sufficient market demand to encourage "charging equipment and vehicle manufacturers "to "standardize charging equipment to better integrate electric vehicles with the grid." In addition, SDG&E is participating in the Vehicle-Grid Integration ("VGI") Communications protocol development working groups, which are part of the CPUC's SB 350 implementation work. (2017 Draft IEPR, p. 121)

c. SDG&E's Efforts to Accelerate Distributed Energy Resources Align with IEPR Recommendations:

1. *Continue to support research on distributed energy resources ("DER") including demand response, storage, VGI, and microgrids.*

   SDG&E's Clean Transportation intends to continue its tradition of supporting research and projects that further VGI and "to accelerate customer participation in DER aggregation and in electricity markets." (2017 Draft IEPR, p. 141)

d. SDG&E's Efforts in Electricity and Natural Gas Demand Forecast Align with IEPR Recommendations:

1. *Work with stakeholders and the California Air Resources Board to develop reasonable scenarios for transportation electrification impacts for the revised IEPR demand forecast.*

   SDG&E's Clean Transportation group provided input, guidance and recommendations for the current IEPR transportation forecast and looks forward to future work on reasonable scenarios for transportation electrification impacts. (2017 Draft IEPR p. 186)

IV. THE CEC SHOULD BE CAREFUL TO ATTRIBUTE SAVINGS TO THE APPROPRIATE SECTORS WHEN DETERMINING ENERGY EFFICIENCY DOUBLING TARGETS

In general, SDG&E is concerned that it will be difficult for the CEC to pin down exactly what savings are attributable to what sector. Providing transparency into the assumptions used to develop sector targets for doubling energy efficiency ("EE") will be critical to confirm validity.

SB 350 directs the CEC to establish annual targets for statewide EE savings and demand reduction that will achieve a statewide cumulative doubling of EE savings in electricity and natural gas end uses by January 1, 2030. The CEC has identified multiple sectors that will contribute to the doubling of EE savings, including:[4]

i. IOU Programs
ii. POU Programs
iii. Codes & Standards
iv. Financing
v. Behavioral & Market Transformation
vi. Agriculture & Industry

Additionally, the CEC points out that "[w]hile the Energy Commission has categorized these additional cost-effective energy savings as non-utility programs, these savings could also be realized by future expansions of utility energy efficiency programs."[5] Below are some potential areas of overlap that SDG&E has identified based on the list of non-utility opportunities provided on page 57 of the 2017 Draft IEPR.

a. Financing (Prop 39): SDG&E notes that there is a tight nexus between savings attributable to Prop 39 versus IOU programs. Schools that receive Prop 39 funding often also receive utility incentives. The CEC must distinguish between the savings

[4] 2017 Draft IEPR, p. 54.
[5] 2017 Draft IEPR, p. 56.

attributable to utility incentives and Prop 39 funding to produce realistic targets for both the IOU and non-IOU sectors.

b. Behavioral & Market Transformation (State-wide Benchmarking and Public Disclosure Program): AB 802 requires that customers/building owners have access to a certain level of usage data. The CEC suggests that this knowledge will result in additional non-utility savings. However, SDG&E anticipates that building owners with problematic usage data will likely participate in utility incentive programs, including behavioral and retro-commissioning programs, resulting in a high degree of double counting of savings attributable to utility incentives versus AB 802's benchmarking reforms.

V. SELF-GENERATION CUSTOMERS SHOULD BE EXCLUDED FROM AAEE POTENTIAL

The 2017 Draft IEPR recommends that the CEC should develop AAEE scenarios.[6] SDG&E recommends adding this to the list of recommendations for the next round of AAEE updates:

a. Study the increased market penetration and saturation of solar (i.e., rooftop solar) and other self-generated energy production/consumption and the locational distribution of the corresponding EE potential.

Current CPUC policy limits program incentives and customer participation to the extent that energy savings do not exceed the customer's utility energy purchases.[7] This means that self-generation customers are typically not eligible for EE incentives. In territories with a high degree of solar penetration, this could have a significant impact on the volume of AAEE.

VI. NATURAL GAS INFRASTRUCTURE CAN ADVANCE THE STATE'S LONG-TERM SAFETY, RELIABILITY, AND CLIMATE OBJECTIVES

The Final 2017 IEPR should expressly recognize the important role that natural gas infrastructure plays in achieving the state's long-term safety, reliability, and climate objects, *even as the state works to transition away from fossil fuels to meet 2030 and 2050 climate goals*.

[6] 2017 Draft IEPR, p. 185.

[7] California Public Utilities Commission, *Energy Efficiency Savings Eligibility at Sites with non-IOU Supplied Energy Sources—Guidance Document, Version 1.1*, at p. 3 (November 6, 2015).

a. San Diego's Gas Supply System Remains Constrained, Threatening Reliability and the Integration of Renewables

The San Diego natural gas system remains capacity constrained, which creates a risk to reliability and the ability to integrate renewables. Chapter 11 of the 2017 Draft IEPR recognizes the importance of the Pio Pico and Carlsbad power plant approvals for maintaining local reliability following the close of the San Onofre Nuclear Generating Station ("SONGS"), as confirmed by the CAISO. However, those plants, and all natural gas plants in the San Diego region, are subject to the reliability risks of a constrained natural gas system. Chapter 11 of the 2017 Draft IEPR should recognize the need to mitigate this risk to ensure reliability today and in the future. Because Pio Pico, Carlsbad and many of the local natural gas power plants are flexible and fast ramping, a reliable gas supply will support the integration of renewables and the state's climate goals through 2030 and beyond, in addition to providing myriad benefits to core and non-core customers that depend on a stable natural gas supply.

b. Renewable Gas in San Diego Region Depends on Reliable Gas Supply

SDG&E is supportive of comments made by our sister company, SoCalGas, on renewable gas. We also note that in the absence of PSRP, the San Diego region's ability to share in the myriad benefits of renewable gas would be uniquely jeopardized due to the region's constrained natural gas system. Today's maximum benefits come when renewable gas or electricity is used to replace diesel transportation fuel – significantly reducing GHG and NOx emissions. As stated in the 2017 Draft IEPR, transportation is a near-term strategy to beneficially utilize the State's Short-Lived Climate Pollutants ("SLCP") emission sources. As the demand for renewable fuels in the transportation sector develops over time, more renewable gas will be developed and become available to decarbonize natural gas end uses in residential and commercial uses, as well as to generate renewable electricity. Using the pipeline system will provide this resource access to the broadest market, enabling greater flexibility and maintaining long-term value. But the pipeline system must be maintained and improved via targeted infrastructure investments, such as PSRP.

c. Infrastructure Upgrades Support Methane Leak Reduction Policies

The SLCP Reduction Strategy states that since "California relies on natural gas for a large fraction of its energy supply, it is critical to increase supplies of renewable natural gas and minimize fugitive emissions of methane from natural gas infrastructure."[8] Infrastructure upgrade projects such as PSRP advance the objectives of the SLCP Reduction Strategy by further modernizing the natural gas system. Indeed, the SLCP Reduction Strategy acknowledges that "the replacement of older pipelines" and projects

[8] ARB, Short-Lived Climate Pollutant Reduction Strategy (March 14, 2017), at 56.

"to minimize natural gas leaks from CPUC-regulated intrastate transmission and distribution gas pipelines and facilities" advance the State's climate objectives.[9]

d. New or Upgraded Infrastructure is Needed to Meet the State's More Stringent Safety Standards for Natural Gas Pipelines

The State's safety standards for natural gas pipelines have increased in recent years, and SDG&E has taken every step to ensure our pipelines are operating safely and in compliance with the law. The CPUC has required all natural gas operators to submit Pipeline Safety Enhancement Plans ("PSEP") designed to bring aging infrastructure up to modern standards. The proposed PSRP would implement SDG&E and SoCalGas' PSEP for Line 1600, one of only two natural gas transmission lines bringing gas into San Diego County from the north. Line 1600 has been subject to multiple emergency mandates issued by the CPUC since July 2016, including requirements to reduce operating pressure by 20%, perform additional inspections, and perform additional surveys. SDG&E and SoCalGas propose to construct the PSRP to permanently lower the pressure of the Line 1600 to distribution service level. Despite the critical need for this project to be built, the application for the project remains with the CPUC.

e. Benefits of the PSRP Should be Reflected in the IEPR for Improving Safety, Enhancing Reliability, Facilitating Renewable Gas and Reducing Methane Leaks

For the reasons expressed above, we request that the 2017 Draft IEPR's description of the PSRP (see page 238) be modified as follows to reflect the project's anticipated benefits:

> The CPUC is reviewing SDG&E and SoCalGas' application to construct, operate, and maintain a new 47-mile pipeline that would transport natural gas from the proposed Rainbow Pressure-Limiting Station at the Riverside/San Diego County line, south to the Marine Corps Air Station Miramar in San Diego. The proposed pipeline would replace existing transmission Line 1600, which, under this proposal, would be converted to a distribution line. This project would increase system capacity, enhance public safety consistent with new regulatory requirements, improve reliability by reducing dependence on Line 1600 and modernize the gas supply system in the San Diego which has long been recognized as constrained, further modernize the natural gas system, facilitate the long-term growth and utilization of renewable gas in the region, and modernize the system by using state-of-the-art materials and technologies (cathodic protection to protect pipelines from corrosion, internal inspection launching and receiving equipment, intrusion detection and leak monitoring system, etc.).

[9] *Id.* at 81-82.

VII. CONCLUSION

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Tim Carmichael

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